

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

PIERRE BRAZEAU, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI BARBIER,
ERIC J. SCHOEN, JAMES W. KUPIEC,
NADAV FRIEDMANN and MICHAEL
MARSMAN,

Defendants.

Case No. 1:21-cv-00751-RP

WANDA NEWELL, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI BARBIER,
and ERIC J. SCHOEN,

Defendants.

Case No. 1:21-cv-00760-RP

KATLYN K. REIN, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI BARBIER,
ERIC J. SCHOEN, JAMES W. KUPIEC,
NADAV FRIEDMANN and MICHAEL
MARSMAN,

Defendants.

Case No. 1:21-cv-00856-RP

**NOTICE OF NON-OPPOSITION OF THI HUYEN VU, QING YANG, RONALD L.
SELMAN, AND VINOD K. THUKRAL TO COMPETING
LEAD PLAINTIFF MOTIONS**

TO THE CLERK OF THE COURT, ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Thi Huyen Vu, Qing Yang, Ronald L. Selman, and Vinod Thukral (“Movants”) respectfully do not oppose the competing motions for consolidation of the above-captioned actions (the “Actions”), appointment as lead plaintiff, and approval of selection of lead counsel. On October 26, 2021, Movants timely filed a motion for consolidation, appointment as lead plaintiffs, and approval of selection of counsel, stating that they collectively suffered approximately \$1,017,230.79 in financial losses in connection with their purchase of Cassava Sciences, Inc. (“Cassava”) securities between September 14, 2020 and August 27, 2021, inclusive. Similar motions for consolidation, appointment as lead plaintiff, and approval of selection of counsel were filed by other putative class members in the Actions.

The Private Securities Litigation Reform Act of 1995 (“PSLRA”) provides a presumption that the “most adequate plaintiff” to represent the interests of class members is the person or group that, among other things, has “the largest financial interest in the relief sought by the class.” 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I). Based upon a review of the competing motions and supporting papers provided by the other movants seeking appointment as lead plaintiff, it appears that, while Movants are well-qualified to serve as Lead Plaintiffs in the Actions, they do not possess the “largest financial interest in the relief sought by the class” as required by the PSLRA. 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(bb).

This non-opposition shall have no impact on Movants’ membership in the proposed class, their right to share in any recovery obtained for the benefit of the class, nor their ability to serve as lead plaintiffs should the need arise.

Dated: November 3, 2021

Respectfully submitted,

**STECKLER WAYNE COCHRAN CHERRY
PLLC**

/s/ Stuart L. Cochran
Stuart L. Cochran
Texas Bar No.: 24027936
Braden M. Wayne
Texas Bar No.: 24075247
12720 Hillcrest Rd., Suite 1045
Dallas, Texas 75230
T: 972-387-4040
F: 972-387-4041
stuart@swclaw.com
braden@swclaw.com

Liaison Counsel for Movants

LEVI & KORSINSKY, LLP
Shannon L. Hopkins
1111 Summer Street, Suite 403
Stamford, CT 06905
Tel.: (203) 992-4523
Fax: (212) 363-7171
shopkins@zlk.com

Counsel for Movants

CERTIFICATE OF SERVICE

I hereby certify that on this day, November 3, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Stuart L. Cochran
Stuart L. Cochran